

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re: § **Chapter 11**
§
FIELDWOOD ENERGY III LLC, et al., § **Case No. 20-33948 (MI)**
§
§ **(Jointly Administered)**
Post-Effective Date Debtors.¹ §

**STIPULATION AND AGREED ORDER EXTENDING RESPONSE
DEADLINE TO CLAIM OBJECTION AND ADJOURNING HEARING DATE**

The administrator of the chapter 11 plan (the “Plan Administrator”) of the above-captioned reorganized debtors (collectively, the “Debtors,” as applicable, and after the effective date of their plan of reorganization, the “Reorganized Debtors”) and the Claimants (defined below) hereby stipulate and agree as follows:

WHEREAS, on October 6, 2021, the Plan Administrator filed that certain *Third Omnibus Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code and Rule 3007 of the Federal Rules of Bankruptcy Procedure Seeking to Disallow Certain Claims (Multi-Debtor Claims)* [Docket No. 2078] (the “Objection”), which, *inter alia*, seeks the disallowance of certain claims filed against the Debtors, including certain claims filed by Lexon Insurance Company,

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date FWE I Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

Ironshore Specialty Insurance Company, and Ironshore Indemnity Inc. (collectively, the “Claimants”, and together with the Plan Administrator, the “Parties”), all as more fully set forth in the Objection;

WHEREAS, the deadline for the Claimants to object or otherwise respond to the Objection was initially November 5, 2021 (the “Response Deadline”);

WHEREAS, on November 4, 2021, the Court entered the *Stipulation and Agreed Order Extending Response Deadline to Claim Objection* [Docket No. 2153], which extended the Response Deadline for Claimants to November 19, 2021;

WHEREAS, the Objection is currently set for a hearing with the Court on December 8, 2021 at 10:00 a.m. (Central Time) (the “Hearing”); and

WHEREAS, the Parties are continuing to engage in certain informal discussions regarding the Objection and have agreed, subject to approval of this Court, to extend the Response Deadline and adjourn the Hearing.

NOW, THEREFORE, IT IS STIPULATED AND AGREED TO BY THE PARTIES, AND UPON APPROVAL BY THE COURT OF THIS STIPULATION, IT IS SO ORDERED AS FOLLOWS:

1. The above recitals are incorporated by reference herein with the same force and effect as if fully set forth hereinafter.
2. Pursuant to paragraph 7 of the Procedures, the Parties have agreed to adjourn the Hearing on the Objection, solely with respect to the Claimants, to a later date to be determined in consultation with the Court’s Case Manager, notice of which may be filed with the Court by any of the Parties, *provided, that*, no less than 20 days’ notice of any continued Hearing (a “Continued Hearing”) shall be provided.

3. Claimants' Response Deadline shall be 5 business days prior to the Continued Hearing.

Dated:

Honorable Marvin Isgur
United States Bankruptcy Judge

AGREED AS TO FORM AND CONTENT:

Dated: November 18, 2021

BY: /s/ Michael D. Warner

Michael D. Warner, Esq. (TX Bar No. 00792304)
Benjamin L. Wallen, Esq. (TX Bar No. 24102623)
PACHULSKI STANG ZIEHL & JONES LLP
440 Louisiana Street, Suite 900
Houston, TX 77002
Telephone: (713) 691-9385
mwarner@pszjlaw.com
bwallen@pszjlaw.com

-and-

Gabriel Sasson, Esq. (Admitted *pro hac vice*)
John F. Iaffaldano, Esq. (Admitted *pro hac vice*)
STROOCK & STROOCK & LAVAN LLP
180 Maiden Lane
New York, NY 10038
Telephone: (212) 806-5400
gsasson@stroock.com
jiaffaldano@stroock.com

Counsel for the Plan Administrator

Dated: November 18, 2021

BY: /s/ Lee E. Woodard

Lee E. Woodard, Esq. (admitted *pro hac vice*)
Brian D. Roy, Esq.
HARRIS BEACH PLLC
333 West Washington Street, Suite 200
Syracuse, NY 13202
Telephone: (315) 214-2052
Fax: (315) 422-9331
lwoodard@harrisbeach.com
broy@harrisbeach.com

*Counsel for Lexon Insurance Company, Ironshore
Specialty Insurance Company and Ironshore
Indemnity Inc.*